

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 HECTOR MOLINA,  
a/k/a "Chubbs"

D-2 BRANDON CLAIBORNE,  
a/k/a "Fat Daddy"

D-3 ANDREW ADCOCK,  
a/k/a "White Boi"

Case:4:18-cr-20594  
Judge: Parker, Linda V.  
MJ: Davis, Stephanie Dawkins  
Filed: 09-05-2018 At 02:49 PM  
INDI SEALED v SEALED (sk)

Defendants.

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**INDICTMENT**

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**THE GRAND JURY CHARGES:**

**COUNT ONE**

**Distribution of Heroin  
(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C))**

**D-1 HECTOR MOLINA**

On or about February 10, 2015, in the Eastern District of Michigan,  
HECTOR MOLINA knowingly and intentionally distributed a mixture or

substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT TWO**

**Distribution of Heroin**  
**(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C); 18 U.S.C. § 2)**

**D-1 HECTOR MOLINA**  
**D-2 BRANDON CLAIBORNE**

On or about April 16, 2015, in the Eastern District of Michigan, HECTOR MOLINA and BRANDON CLAIBORNE, aided and abetted by each other, knowingly and intentionally distributed a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT THREE**

**Distribution of Heroin**  
**(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C))**

**D-1 HECTOR MOLINA**

On or about May 6, 2015, in the Eastern District of Michigan, HECTOR MOLINA knowingly and intentionally distributed a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FOUR**

**Distribution of Heroin  
(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C))**

**D-1 HECTOR MOLINA**

On or about May 28, 2015, in the Eastern District of Michigan, HECTOR MOLINA knowingly and intentionally distributed a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FIVE**

**Possession of a Firearm by a Prohibited Person  
(18 U.S.C. § 922(g)(1); 18 U.S.C. § 2)**

**D-1 HECTOR MOLINA**

On or about June 19, 2015, in the Eastern District of Michigan, HECTOR MOLINA aided and abetted another person, knowing or having cause to know that person had been previously convicted of a crime punishable by a term of imprisonment exceeding one year, in knowingly possessing, in and affecting interstate commerce, a firearm, that is a Hi-Point, Model JCP, .40 caliber semi-automatic pistol, in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SIX**

**Possession of a Firearm by a Prohibited Person  
(18 U.S.C. § 922(g)(1))**

**D-3 ANDREW ADCOCK**

On or about June 19, 2015, in the Eastern District of Michigan, ANDREW ADCOCK, after having been convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting interstate commerce, a firearm, that is a Hi-Point, Model JCP, .40 caliber semi-automatic pistol and a Rossi, .38 caliber revolver, in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SEVEN**

**Distribution of Methamphetamine  
(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C))**

**D-3 ANDREW ADCOCK**

On or about June 26, 2015, in the Eastern District of Michigan, ANDREW ADCOCK, knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT EIGHT**

**Possession of a Firearm by a Prohibited Person  
(18 U.S.C. § 922(g)(1))**

**D-3 ANDREW ADCOCK**

On or about June 26, 2015, in the Eastern District of Michigan, ANDREW ADCOCK, after having been convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting interstate commerce, a firearm, that is a Hi-Point, Model 4095, .40 caliber rifle, in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT NINE**

**Carrying a Firearm During and in Relation to a Drug Trafficking Crime  
(18 U.S.C. § 924(c)(1)(A))**

**D-3 ANDREW ADCOCK**

On or about June 26, 2015, in the Eastern District of Michigan, ANDREW ADCOCK knowingly carried a firearm, that is, a Hi-Point, Model 4095, .40 caliber rifle, during and in relation to a drug trafficking crime, for which he may be prosecuted in a court of the United States, that is, distribution of methamphetamine as alleged in Count Seven of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT TEN**

**Distribution of Methamphetamine  
(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C))**

**D-3 ANDREW ADCOCK**

On or about July 21, 2015, in the Eastern District of Michigan, ANDREW ADCOCK knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT ELEVEN**

**Possession of a Firearm by a Prohibited Person  
(18 U.S.C. § 922(g)(1))**

**D-3 ANDREW ADCOCK**

On or about July 21, 2015, in the Eastern District of Michigan, ANDREW ADCOCK, after having been convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting interstate commerce, a firearm, that is, a Desert Eagle, .41/44 Magnum caliber, semi-automatic pistol, in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWELVE**

**Carrying a Firearm During and in Relation to a Drug Trafficking Crime  
(18 U.S.C. § 924(c)(1)(A))**

**D-3 ANDREW ADCOCK**

On or about July 21, 2015, in the Eastern District of Michigan, ANDREW ADCOCK knowingly carried a firearm, that is, a Desert Eagle, .41/44 Magnum caliber, semi-automatic pistol, during and in relation to a drug trafficking crime, for which he may be prosecuted in a court of the United States, that is, distribution of methamphetamine as alleged in Count Ten of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

**FORFEITURE ALLEGATION**

**Drugs, Proceeds, and Facilitating Property  
(21 U.S.C. § 853(a))**

The allegations contained in Count One, Count Two, Count Three, Count Four, Count Six, and Count Nine of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a).

Upon conviction of an offense charged in Count One, Count Two, Count Three, or Count Four of this Indictment, HECTOR MOLINA shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a) any

property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

Upon conviction of an offense charged in Count Two of this Indictment, BRANDON CLAIBORNE shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

Upon conviction of an offense charged in Count Seven or Count Ten of this Indictment, ANDREW ADCOCK shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

### **FORFEITURE ALLEGATION**

**(18 U.S.C. § 924(d)(1))**

The allegations contained in Count Five of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture



pursuant to Title 18, United States Code, Section 924(d)(1). Upon conviction of an offense charged in Count Five of this Indictment, HECTOR MOLINA, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), any firearm or ammunition involved in said offense including but not limited to a Hi-Point, Model JCP, .40 caliber semi-automatic pistol, serial number X7146477.

The allegations contained in Count Six, Count Eight, Count Nine, Count Eleven, and Count Twelve of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1). Upon conviction of an offense charged in Count Six, Count Eight, Count Nine, Count Eleven, or Count Twelve of this Indictment, ANDREW ADCOCK, shall forfeit to the United States, under Title 18, United States Code, Section 924(d)(1), any firearm or ammunition involved in said offenses including but not limited to a Hi-Point, Model JCP, .40 caliber semi-automatic pistol, serial number X7146477; a Rossi, .38 caliber revolver, serial number W061953; a Hi-Point, Model 4095, .40 caliber rifle, serial number H23948; and a Desert Eagle, .41/44 Magnum caliber, semi-automatic pistol, serial number 107493.

**THIS IS A TRUE BILL.**

s/GRAND JURY FOREPERSON

Dated: 9-5-18

MATTHEW SCHNEIDER  
United States Attorney

s/BLAINE T. LONGSWORTH  
Assistant United States Attorney  
600 Church Street, Flint, MI 48502  
P55984

s/ANTHONY P. VANCE  
Assistant United States Attorney  
Chief, Branch Offices

Case:4:18-cr-20594

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United States District Court  
Eastern District of Michigan**Criminal C**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	<b>Judge Assigned:</b>
<input type="checkbox"/> Yes <input type="checkbox"/> No	<b>AUSA's Initials:</b>

Case Title: USA v. HECTOR MOLINA, et alCounty where offense occurred : GeneseeCheck One: ☒ Felony☐ Misdemeanor☐ Petty☒ Indictment/ ☐ Information --- no prior complaint.☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: ]☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

☐ Corrects errors; no additional charges or defendants.☐ Involves, for plea purposes, different charges or adds counts.☐ Embraces same subject matter but adds the additional defendants or charges below:Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

September 5, 2018  
Dates/BLAINE T. LONGSWORTHBLAINE T. LONGSWORTH, AUSA  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.